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March 23, 2023

VIA ECF

The Hon. Robert B. Kugler
United States District Judge
USDJ, District of New Jersey
Mitchell H. Cohen Building & U.S.
Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

Special Master
Hon. Thomas Vanaskie
Stevens & Lee
1500 Market Street, East
Tower, 18th Floor
Philadelphia, PA 19103

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,
No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

I am writing as Liaison Counsel for Manufacturer Defendants to request that the Court enter the attached proposed order amending Case Management Order No. 29 to reflect the parties' agreement to a short extension of the current deadlines for filing opposition and reply briefs in connection with the parties' *Daubert* motions. The parties have also agreed that plaintiffs may file two briefs in opposition to defendants' Motion To Partially Exclude Opinions Of Drs. Stephen Hecht And Ramin Najafi ([ECF No. 2292](#)) in order to address each of these proposed experts separately, and that defendants may file two reply briefs in support of the motion.

As set forth in the attached proposed order, the new briefing deadlines agreed upon by the parties are as follows:

- Responsive briefs in opposition to *Daubert* motions: April 11, 2023
- Reply briefs in support of *Daubert* motions: April 25, 2023

The Honorable Robert B. Kugler
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Thank you for your consideration of this request.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jessica Davidson".

Jessica Davidson

Enclosure

CC: All Counsel (via ECF)